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MEMO ENDORSED

FASULO BRAVERMAN & DI MAGGIO, LLP

ATTORNEYS AT LAW

February 18, 2020

Hon. Kenneth M. Karas
United States District Court for the
Southern District of New York
300 Quarropas Street
White Plains, New York

Re: *United States v. Robert Ciervo*
Case No.: 19 Cr. 773 (KMK)

Dear Judge Karas,

I was assigned, pursuant to the Criminal Justice Act, to represent Robert Ciervo in the above referenced matter. Previously, this Court authorized the mother of Robert Ciervo to transport Mr. Ciervo to the Passaic County Superior Court in New Jersey to address a pending Violation of Probation. The matter was adjourned to this Friday, February 21, 2020. In order for Mr. Ciervo to address this matter in Passaic County Superior Court, and since neither the inpatient drug treatment program, Pre-Trial Services, or the US Marshalls are able to transport Mr. Ciervo to the Court from the treatment program, we ask the Court once more modify Robert Ciervo's bail conditions to authorize his mother Donnamarie Ciervo to transport her son to and from the Passaic County Superior Court this Friday, February 21 to appear on the pending violation.

If approved, Mrs. Ciervo would drive Robert Ciervo out of the inpatient program and to his State court appearance this Friday, February 21, then return Mr. Ciervo to the inpatient program upon completion of the violation hearing. Please note that Mrs. Ciervo was previously authorized to drive Mr. Ciervo from the court to the inpatient program when he was originally released on bail, as well as to his prior court appearance in Passaic County, NJ. Furthermore, Mrs. Ciervo understands that she is not to make any unnecessary stops as she is solely authorized to transport Mr. Ciervo to and from the Passaic County Superior Court appearance.

Pre-Trial Services has no objection to this request. The Government has indicated that they are "concerned regarding the security of the proposed transportation arrangement, but in view of the fact that the Discovery Institute, the United States Marshals Service, and pretrial services in Passaic County

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Superior Court cannot arrange transportation, the Government has no objection.”

Thank you for your attention in this matter. Should you require any additional information, please do not hesitate to contact me.

Respectfully submitted,

s/ Sam Braverman

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Cc: Lindsey Keenan, AUSA

Cynthia Labrovic, Pre-Trial Services – SDNY (Via email)

Kathleen Cullen, Pre-Trial Services – DNJ (Via email)

Granted

SO ORDERED


KENNETH M. KARAS U.S.D.J.

2/20/2020

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